

EXHIBIT 15

FILED UNDER SEAL

JOHN TAYLOR - 08/02/2018

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MINNESOTA
3 CASE NO. 16-CV-1054 (WMW/DTS)
4 - - - - -
5 FAIR ISAAC CORPORATION, a Delaware corporation,
6 Plaintiff,
7 vs.
8 FEDERAL INSURANCE COMPANY, an Indiana corporation,
9 Defendant.

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12 TRANSCRIPT of the stenographic notes of
13 the 30(b)(6) videotaped deposition of John Taylor in
14 the above-entitled matter, as taken by and before
15 LORRAINE B. ABATE, a Certified Court Reporter and
16 Notary Public of the State of New Jersey and
17 Registered Professional Reporter, held at the offices
18 of Regus, 55 Madison Avenue, Morristown, New Jersey,
19 on Thursday, August 2, 2018, commencing at 9:01 a.m.,
20 pursuant to Notice.

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23 Job No. MP-184257

24 Pages: 1 - 116

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<p style="text-align: right;">Page 34</p> <p>1 Q. What is the -- tell me the approximate 2 percent that you think it is. 3 MR. FLEMING: Objection, foundation. 4 A. I don't know the approximate percent. I 5 just know it's not 78 percent. 6 Q. You're just saying it can't be precisely 7 the same number? 8 A. Correct. 9 Q. For the time period before the merger, 10 were the insurance policies sold in the name of 11 Federal and its various subsidiaries in the United 12 States sold by independent insurance agencies or 13 independent brokers? 14 A. Yes. 15 Q. Yes. Is that -- was that pre-merger 16 also true for the Europe, Australia, Canada, those 17 three companies? 18 A. I don't know. 19 Q. Post-merger, are the insurance policies 20 of Federal and its various subsidiaries sold in the 21 United States still sold through independent agencies 22 and independent brokers? 23 MR. FLEMING: Objection, foundation as 24 to time. 25 A. Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 sells insurance policies. 2 Q. How do you distinguish that from an 3 insurance broker? 4 A. A broker -- a broker deals with larger 5 risks and I think of more of a brokerage house as 6 supposed to an individual broker. 7 Q. So are you seeing an insurance agent as 8 being more of a solo practitioner and an insurance 9 broker as being more of someone who's operating in a 10 group? 11 A. Correct. 12 Q. And is it -- was it true post-merger 13 that the insurance agents and insurance brokers 14 through whom Federal and its various subsidiaries 15 sold insurance policies, those agents and brokers 16 also sold insurance from competing companies? 17 A. I don't know. 18 Q. Okay. And anything -- do you know 19 anything that would restrict them from doing that? 20 MR. FLEMING: Objection, lack of 21 foundation. 22 A. Can you repeat that question. 23 Q. Do you know if Federal or any of its 24 subsidiaries limit the business of any insurance 25 agent or broker to be exclusive to Federal?</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. And then post-merger, do you know if 2 that's also true for the insurance companies in 3 Europe, Australia, and Canada? 4 A. No. No, I don't know. 5 Q. You still don't know? 6 A. Yes. 7 Q. Got it. Pre-merger, did Federal or any 8 of its subsidiaries have a captive sales force? 9 A. Not that I'm aware of. 10 Q. And post-merger, does it have -- does 11 Chubb Limited -- I'm sorry, post-merger, does Federal 12 or any of its subsidiaries now have a captive sales 13 force? 14 A. Not that I'm aware of. 15 Q. Is there a meaningful difference between 16 the term insurance agent and insurance broker? 17 A. Yes. 18 Q. What are the -- what is an insurance 19 agent? 20 MR. FLEMING: Object. Foundation and 21 outside the category you have identified in the Rule 22 30(b)(6) notice. 23 Q. What is the definition of an insurance 24 agent? 25 A. An agent is generally an individual that</p>	<p style="text-align: right;">Page 37</p> <p>1 A. I don't know. 2 Q. And how about post-merger, same 3 questions. 4 A. Don't know. 5 Q. Does Federal Insurance Company have any 6 employees outside of the United States pre-merger? 7 A. I don't believe so. 8 Q. Does Federal Insurance Company have any 9 employees outside of the United States post-merger? 10 A. I don't believe so. 11 Q. We know pre-merger that one of the 12 divisions of Federal Insurance Company is Chubb & 13 Son. 14 Are you aware of that? 15 A. Yes. 16 Q. Do you know that? 17 A. I know that. 18 Q. All right. 19 Pre-merger, did Federal Insurance 20 Company have any other divisions in addition to Chubb 21 & Son? 22 A. Not that I'm aware of. 23 Q. Post-merger, does Federal Insurance 24 Company have any divisions other than Chubb & Son? 25 A. No, not that I'm aware of.</p>

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<p style="text-align: right;">Page 38</p> <p>1 Q. And post-merger, Chubb & Son continues</p> <p>2 to be a division of Federal?</p> <p>3 A. Correct.</p> <p>4 Q. Do we agree that Chubb & Son, as a</p> <p>5 division, is an unincorporated entity?</p> <p>6 MR. FLEMING: To the extent it calls for</p> <p>7 a legal conclusion.</p> <p>8 A. As of what -- to the best of my</p> <p>9 knowledge.</p> <p>10 Q. That's what a division is, correct?</p> <p>11 Agreed?</p> <p>12 A. To the best of my knowledge, yes. To</p> <p>13 the best of my knowledge, yes.</p> <p>14 Q. So is it also accurate to say that Chubb</p> <p>15 & Son as a division itself does not have any</p> <p>16 subsidiaries?</p> <p>17 A. Correct.</p> <p>18 Q. Staying with this Exhibit 18, on page 3,</p> <p>19 and under property and casualty insurance, again, it</p> <p>20 tells us that Chubb & Son, a Division of Federal, is</p> <p>21 the manager of several U.S. subsidiaries in the P&C</p> <p>22 group.</p> <p>23 Pre-merger, do you have -- can you give</p> <p>24 us an overview of the responsibilities of Chubb &</p> <p>25 Son, a division, as a manager of several U.S.</p>	<p style="text-align: right;">Page 40</p> <p>1 difference between what Federal, through its division</p> <p>2 Chubb & Son, did as a manager relative to what it did</p> <p>3 as a servicer?</p> <p>4 A. There were management and service</p> <p>5 agreements. I tend to think of them as one and the</p> <p>6 same, that Federal -- that Federal had with the</p> <p>7 subsidiaries. Federal had all the employees. The</p> <p>8 subsidiaries did not have employees. So Federal</p> <p>9 essentially, through its employees, managed and</p> <p>10 serviced those subsidiaries.</p> <p>11 Q. And is that arrangement of management</p> <p>12 and service responsibilities provided by Federal</p> <p>13 through the division to the various subsidiaries, has</p> <p>14 that continued post-merger?</p> <p>15 A. At what -- that's a long time period.</p> <p>16 Q. Okay. Let me rephrase that.</p> <p>17 From 2016 to date, has the</p> <p>18 responsibility of Federal through the division Chubb</p> <p>19 & Son changed when we speak to providing services and</p> <p>20 management?</p> <p>21 MR. FLEMING: Objection, multiple</p> <p>22 questions. Also, a foundation issue.</p> <p>23 A. Federal still manages the subsidiaries.</p> <p>24 Q. It does post-merger as well?</p> <p>25 A. Post-merger.</p>
<p style="text-align: right;">Page 39</p> <p>1 subsidiaries in the P&C group.</p> <p>2 MR. FLEMING: Objection, multiple</p> <p>3 questions.</p> <p>4 Q. Do you understand what I'm asking?</p> <p>5 A. Could you repeat that.</p> <p>6 Q. I sure can.</p> <p>7 My time frame is pre-merger. My</p> <p>8 question is an overview of responsibilities of Chubb</p> <p>9 & Son as a manager of several U.S. subsidiaries in</p> <p>10 the P&C group.</p> <p>11 A. Federal had a number of agreements with</p> <p>12 subsidiaries to manage the various underwriting</p> <p>13 activities and other administrative duties of those</p> <p>14 subsidiaries.</p> <p>15 Q. Okay. Anything further that you would</p> <p>16 include in that description? Is that the full scope</p> <p>17 of the responsibilities?</p> <p>18 A. Can you read back my --</p> <p>19 Q. That's okay. We'll get into some</p> <p>20 documents. Let's do it through that.</p> <p>21 A. Okay.</p> <p>22 Q. And then it goes on to say and also</p> <p>23 provides certain services to other insurance</p> <p>24 companies.</p> <p>25 Do you know what -- if there is a</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. FLEMING: We have been going about</p> <p>2 an hour. Is this a natural stopping point to take a</p> <p>3 short break?</p> <p>4 MR. HINDERAKER: Yeah, just give me a</p> <p>5 minute here to look at a couple of things.</p> <p>6 Q. I'll be showing you in a little while a</p> <p>7 service management document or agreement with Chubb</p> <p>8 Insurance Company of Canada, and I'll show you one</p> <p>9 from Chubb Insurance Company of Australia.</p> <p>10 Do you know if pre-merger, Federal</p> <p>11 provided management service -- management and service</p> <p>12 for Chubb Insurance Company of Europe SE?</p> <p>13 A. I don't -- I don't specifically know</p> <p>14 that.</p> <p>15 Q. Okay. And then you know, I asked you --</p> <p>16 I asked you a question that was post-merger. And let</p> <p>17 me ask you another question post-merger, but a bit</p> <p>18 more specifically. That is to say, post-merger,</p> <p>19 has -- does Federal provide management and service</p> <p>20 functions to legal entities that are no longer its</p> <p>21 wholly-owned subsidiaries?</p> <p>22 A. Yes.</p> <p>23 Q. Yes. Okay. Confirming that</p> <p>24 post-merger, there has been no change in Federal's</p> <p>25 functions with respect to providing management and</p>